

LATHAM & WATKINS LLP  
Robert E. Sims (CA Bar No. 116680)  
Sadik Huseny (CA Bar No. 224659)  
Tyler P. Young (CA Bar No. 291041)  
505 Montgomery Street, Suite 2000  
San Francisco, California 94111-6538  
Telephone: +1.415.391.0600  
Facsimile: +1.415.395.8095  
Email: [Bob.Sims@lw.com](mailto:Bob.Sims@lw.com)  
Email: [Sadik.Huseny@lw.com](mailto:Sadik.Huseny@lw.com)  
Email: [Tyler.Young@lw.com](mailto:Tyler.Young@lw.com)

Attorneys for Plaintiffs  
*Riana Buffin and Crystal Patterson*

EQUAL JUSTICE UNDER LAW  
Phil Telfeyan (CA Bar No. 258270)  
Equal Justice Under Law  
400 7th Street NW, Suite 602  
Washington, D.C. 20004  
Telephone: +1.202.505.2058  
Email: [Ptelfeyan@equaljusticeunderlaw.org](mailto:Ptelfeyan@equaljusticeunderlaw.org)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

RIANA BUFFIN and CRYSTAL  
PATTERSON, on behalf of themselves and  
others similarly situated,

Plaintiffs,

v.

VICKI HENNESSY in her official capacity  
as the San Francisco Sheriff, *et al.*,

Defendants.

CASE NO. 4:15-cv-04959-YGR

**[PROPOSED] INJUNCTION**

Date: March 21, 2019  
Time: 11:00 a.m.  
Courtroom: 1, 4th Floor

The Honorable Yvonne Gonzalez Rogers

1 Consistent with the Court's March 4, 2019 Order (Dkt. 314), the Court hereby:

2 1. Prohibits Defendant the San Francisco Sheriff and the Sheriff's Department from  
3 using the San Francisco Felony-Misdemeanor Bail Schedule, or any form or derivation thereof  
4 that relies on wealth-based elements, as a basis to detain arrestees prior to arraignment in the  
5 City and County of San Francisco.

6 2. Orders Defendant the San Francisco Sheriff and the Sheriff's Department to submit to  
7 the Court, within 30 days, a written plan for how the Sheriff's Department will administer  
8 release of pre-arraignment detainees so as to ensure compliance with the Court's Order such that  
9 operational efficiencies do not trump the significant and fundamental deprivations of liberty at  
10 stake.

11 **IT IS SO ORDERED.**

12  
13 Dated: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Yvonne Gonzalez Rogers  
United States District Court Judge